

Exhibit E- Emails to John Hardin, ESQ in regard to Dan Eaton.



Jennifer Vetrano <jvetrano999@gmail.com>

Dan Eaton- Defendant case 7:24-CV-00325-DC-RCG

28 messages

Jennifer Vetrano <jvetrano999@gmail.com>

Mon, Mar 24, 2025 at 6:42 PM

To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Hi John,

I spoke to Dan Eaton a few minutes ago as I have attempted to serve him over 6 times unsuccessfully in two locations. He asked me to serve the papers to you, as you will be representating him.


Would this be alright with you? Also, where would the best address be to send the process server? Please let me know. Thank you.

Jennifer Vetrano

2 attachments

Screenshot_20250324_184024_M365 Copilot.jpg
527K



 Proof_206325704.pdf
95K

Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com>
To: Jennifer Vetrano <jvetrano999@gmail.com>

Mon, Mar 24, 2025 at 9:01 PM

Ms. Vetrano –

I will respond more fully tomorrow, but we can agree on a date that by which he will be deemed served without having the process server actually serve the documents.

John

John Hardin

PARTNER

Perkins Coie

500 N. Akard Street Suite 3300

Dallas, TX 75201-3347

+1.214.965.7743

johnhardin@perkinscoie.com

perkinscoie.com

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NOTICE: This communication from Perkins Coie LLP may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 10:14 PM

Hi John,

I have paid for service twice for him to date in two different states. Please let me know how to proceed as I need to provide answers to the Judges in a timely manner.

Thank you.

Jennifer Vetrano
[Quoted text hidden]

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 10:16 PM

Hi John,

I have completed the Plaintiff's Memorandum in Opposition to Defendant's Motion to Dismiss. I am sending it out to the Court tomorrow morning via UPS. I will attach all files for your review. Please let me know if you have any questions and the exhibits will be in a separate email. Thank you.

Jennifer Vetrano

[Quoted text hidden]

2 attachments



Exhibit Index-Sasson.pdf
39K



UZIresponsetomotiontodismiss.pdf
95K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 10:18 PM

Exhibit A-Plaintiff's Memorandum in Opposition to Defendant's Motion to Dismiss

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ExhibitAfulldoc.pdf
2256K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 10:20 PM

Exhibit B

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 **ExhibitBfulldocument.pdf**
1443K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 10:56 PM

Exhibit C-Plaintiff's Memorandum in Opposition To Defendant's Motion to Dismiss

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7 attachments

 **ExhibitC5fulldoc.pdf**
618K

 **ExhibitC6fulldoc.pdf**
547K

 **ExhibitC4fulldoc.pdf**
589K

 **ExhibitC2fulldoc.pdf**
446K

 **ExhibitC3fulldoc.pdf**
551K

 **Exhibitic7fulldoc.pdf**
471K

 **ExhibitC1fulldoc1.pdf**
473K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:04 PM

Exhibit D

[Quoted text hidden]

 **ExhibitDfulldoc.pdf**
832K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:06 PM

Exhibit E

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 **ExhibitEfulldoc.pdf**
845K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:10 PM

Exhibit F

[Quoted text hidden]

 **ExhibitF.pdf**
1250K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:12 PM

Exhibit H
[Quoted text hidden]

 **ExhibitHfulldoc.pdf**
4001K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:13 PM

Exhibit I
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 **ExhibitIfulldoc.pdf**
956K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:14 PM

Exhibit J
[Quoted text hidden]

 **exhibitJfulldoc.pdf**
11503K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:15 PM

Exhibit K
[Quoted text hidden]

 **ExhibitKfulldoc.pdf**
532K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:16 PM

Exhibit L
[Quoted text hidden]

 **exhibitlfulldoc.pdf**
461K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:17 PM

Exhibit M

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 **ExhibitMfulldoc.pdf**
10576K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:18 PM

Exhibit N
[Quoted text hidden]

 **ExhibitN.pdf**
1268K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Mon, Mar 24, 2025 at 11:28 PM

John,

Are you representing Dan Eaton, ESQ?

Thanks,

Jennifer Vetrano

On Mon, Mar 24, 2025 at 9:01 PM Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com> wrote:
[Quoted text hidden]

Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com>
To: Jennifer Vetrano <jvetrano999@gmail.com>

Tue, Mar 25, 2025 at 11:18 AM

Ms. Vetrano,

We represent Mr. Eaton for purposes of the litigation that you have filed, and we are authorized to accept service on his behalf. We can agree to treat him as served as of today, meaning that he will need to file his answer, response, or otherwise plead no later than Tuesday, April 15, 2025. There is no need to have a process server come to our offices and serve anyone should you agree to the above.

Having said that, Mr. Eaton, just like Mr. Morali and Mr. Sasson, was not around during the events you complained of, and simply doesn't belong in your suit. Furthermore, he, like Mr. Morali and Mr. Sasson, is not subject to personal jurisdiction in Texas. What is your good faith basis to include him a lawsuit about actions that precede his start date and to further claim that he is subject to personal jurisdiction in Texas?

[Quoted text hidden]
[Quoted text hidden]

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Tue, Mar 25, 2025 at 11:41 AM

John,

I will be sending the court a letter to determine the proper protocol for Dan Eaton to be served with the Judges.

Regards,

Jennifer Vetrano

[Quoted text hidden]

Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com>
To: Jennifer Vetrano <jvetrano999@gmail.com>

Tue, Mar 25, 2025 at 11:44 AM

Ms. Vetrano –

First, I note that you have not responded to my questions regarding a good faith basis to include Mr. Eaton and to serve him in Texas.

Second, as for service, you appear to be rejecting my offer below. As such, there is no agreement as to Mr. Eaton being served or what date that service happened.

[Quoted text hidden]

[Quoted text hidden]

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Tue, Mar 25, 2025 at 11:46 AM

John,

I will ask the court for protocol on Dan Eaton. As for jurisdiction please read the documents I sent you yesterday. Thanks and have a great day!

Jen Vetrano

[Quoted text hidden]

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Tue, Mar 25, 2025 at 3:08 PM

John,

If you are Dan Eaton's lawyer can I serve you his papers at your office via process server? Thanks.

Jen Vetrano

[Quoted text hidden]

Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com>
To: Jennifer Vetrano <jvetrano999@gmail.com>

Tue, Mar 25, 2025 at 3:11 PM

Ms. Vetrano –

As I said this morning – we can reach an agreement between ourselves on the issue. We can agree that he is deemed served as of today and that his deadline to answer, respond, or otherwise plead is 21 days from today (so, April 15, 2025).

[Quoted text hidden]

[Quoted text hidden]

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Tue, Mar 25, 2025 at 3:13 PM

Hi John,

Two additional files for you. I had to correct the font and spacing on my documents before I sent them out today. Wanted to provide you a copy. All other exhibits are the same. Thanks!

Jen Vetrano

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2 attachments

 **UZlresponsetomotiontodismiss.pdf**
176K

 **Exhibit Index.pdf**
108K

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Tue, Mar 25, 2025 at 3:15 PM

John,

He needs to be served formally. I will write to the court and give them an update on what is happening. I am not comfortable by any means doing this without proper documentation of service and that you are not on record as his attorney with the court. Thanks.

Jen Vetrano
[Quoted text hidden]

Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com>
To: Jennifer Vetrano <jvetrano999@gmail.com>

Tue, Mar 25, 2025 at 3:20 PM

Please attach this email to your correspondence where I have told you that I am his attorney, where you acknowledge that he has told you that I am his attorney, where I have offered (twice) to accept service of process, and where I have attempted to move us on to substantive grounds.

[Quoted text hidden]
[Quoted text hidden]

Jennifer Vetrano <jvetrano999@gmail.com>
To: "Hardin, John (Perkins Coie)" <JohnHardin@perkinscoie.com>

Tue, Mar 25, 2025 at 3:22 PM

Hi John,

I am going to proceed to get permission from the court. Thanks.

Jen Vetrano

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Hardin, John (Perkins Coie) <JohnHardin@perkinscoie.com>
Sent: Tuesday, March 25, 2025 3:20:38 PM
To: Jennifer Vetrano <jvetrano999@gmail.com>
Subject: RE: Dan Eaton- Defendant case 7:24-CV-00325-DC-RCG

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